

DOCKET FILE COPY ORIGINAL **Lucent Technologies**
Bell Labs Innovations



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April 21, 1997

By Hand

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

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Federal Communications Commission
Office of Secretary

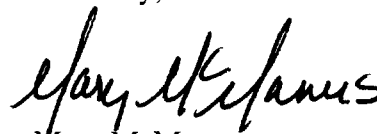
Re: CC Docket No. 94-102 Wireline Consensus Agreement - Revision of
the Commission's Rules to Ensure Compatibility with Enhanced 911
Emergency Calling Systems

Dear Mr. Caton:

Enclosed please find an original and five (5) copies of Lucent Technologies Comments for filing in the above-referenced proceeding. Also enclosed is a copy to be stamped and returned for our files.

Please do not hesitate to contact me should there be any questions.

Sincerely,


Mary McManus

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APR 21 1997

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

Public Service / Telecommunications
Division / Regulatory

In the Matter of)	
)	
Revision of the Commission's Rules)	Wireline Consensus Agreement
to Ensure Compatibility with Enhanced)	CC Docket No. 94-102
911 Emergency Calling Systems)	

COMMENTS OF LUCENT TECHNOLOGIES INC.
IN SUPPORT OF WIRELINE CONSENSUS AGREEMENT

Pursuant to Sections 1.2 and 1.45 of the Commission's Rules (47 C.F.R. §§ 1.2 and 1.45) and to the Commission's Public Notice DA 97-709 dated April 24, 1996, Lucent Technologies Inc. ("Lucent Technologies") submits these comments in support of the consensus agreement reached among the National Emergency Number Association, the Association of Public-Safety Communications Officials-International, Inc., the National Association of State Nine One One Administrators, the Ad Hoc Telecommunications Users Committee, and the Multimedia Telecommunications Association ("E911 Wireline Consensus Agreement" or "Agreement"). The Wireline Consensus Agreement was filed with the Commission *ex parte* on April 1, 1997.

Lucent Technologies is the communications systems and technology company formed as a result of the restructuring of AT&T Corp. ("AT&T") including the former Consumer Products, Business Communications Systems, Network Systems, Microelectronics and Bell Laboratories units of AT&T. The Business Communications Systems unit of Lucent Technologies manufactures and sells customer premises equipment designed for small and large businesses throughout the world.

DISCUSSION

Lucent Technologies shares the interest of both the Commission and public safety providers in broadening the availability of Enhanced 911 systems, so that emergency personnel can quickly find a caller that is not capable of communicating his location verbally.

Lucent Technologies supports the Wireline Consensus Agreement as a reasonable approach to determining which Multi-line Telephone Systems ("MLTS") users can reasonably be required to provide additional location information to a Public Safety Answering Point ("PSAP"). The Agreement uses size of business workspace as a very practical surrogate for case by case analysis. Under the rules contemplated by the Agreement, each 40,000 square feet of workspace at a single location would provide a distinctive identifier to its PSAP on each 911 call dialed from that area of workspace. The public safety communications organizations that participated in the Wireline Consensus Agreement recognized that an emergency response unit would be able to locate a victim quickly within a 40,000 square foot business space.

Similarly, each separate building sharing an MLTS in, for instance, a business park, would be required to provide a distinctive identifier to its PSAP in connection with 911 calls from that building.

Incorporation of the Agreement into the Commission's Enhanced 911 rules will save the vast majority of businesses, i.e., smaller or single-location businesses, from incurring enormous compliance costs with no improvement in safety. Almost all small businesses are at a single location with less than 40,000 square feet of workspace. There the information already provided by the local exchange carrier on an Enhanced 911 call identifies the particular location. In these cases, even though there is an MLTS, requiring terminal-specific location information would add nothing of value because the PSAP system already receives enough location information to allow emergency personnel to reach a victim quickly.

Lucent Technologies strongly supports the Wireline Consensus Agreement's request for preemption of inconsistent state or local requirements for MLTS provision of Enhanced 911 information. Inconsistent requirements of any sort imposed by state or local governments should be preempted in order to assure nationwide consistency of technology development. Manufacturers simply cannot produce equipment on a cost-effective basis if each state or local PSAP provider can dictate its own performance requirements.

CONCLUSION

Lucent Technologies believes that the the Wireline Consensus Agreement offers a reasonable basis for a single single national rule for MLTS - Extended 911

compatibility that rationally apportions responsibility for compliance among manufacturers of MLTSSs, operators of MLTSSs, local exchange carriers and PSAPs.

Respectfully submitted,

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Dated: April 21, 1997